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The Trusted Integrator for Sustainable Solutions

REMOVAL SUPPORT TEAM 2 EPA CONTRACT EP-W-06-072 September 6, 2013

Mr. Keith Glenn, On-Scene Coordinator U.S. Environmental Protection Agency Removal Action Branch 2890 Woodbridge Avenue Edison, NJ 08837

EPA CONTRACT NO: EP-W-06-072

TDD NO: NOT ASSIGNED

DOCUMENT CONTROL NO: RST2-02-F-2531

SUBJECT.

SITE-SPECIFIC HEALTH AND SAFETY PLAN - SUPERIOR BARREL

AND DRUM SITE, ELK TOWNSHIP, GLOUCESTER COUNTY, NEW

JERSEY

Dear Mr. Glenn,

Enclosed please find the Weston Solutions, Inc., Removal Support Team 2 (RST 2) Site-Specific Health and Safety Plan for the multi-media sampling event to be conducted as part of the Removal Assessment of the Superior Barrel and Drum Site located in Elk Township, Gloucester County, New Jersey beginning on September 9, 2013. If you have any questions, please do not he sitate to contact me at (732) 585-4411.

Sincerely,

Weston Solutions, Inc.

Peter Lisichenko

Principle Project Leader/Group Leader

Enclosure

CC:

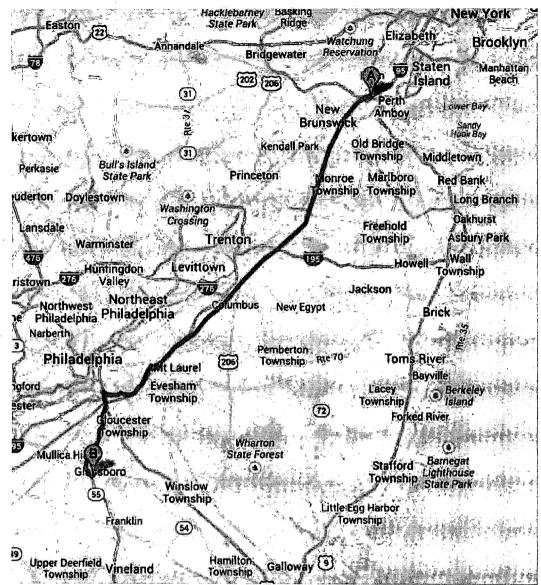
TDD File No.: Not Assigned

REGION II RST 2 HEALTH AND SAFETY PLAN EMERGENCY RESPONSE/REMOVAL ASSESSMENT/REMOVSAL ACTION (Revised 16 March 2011)

Site Name: Superior Barrel and Drum Site TDD No.: Not Assigned 798 Jacob Harris Road Site Address: Street No.: Elk Township City: County/State: Gloucester/New Jersey Directions to Site from Office: (Attach Color Map Following This Page) 1. Head west toward King Georges Rd/King Georges Post Rd 302 ft 2. Turn left onto King Georges Rd/King Georges Post Rd 0.5 mi 3. Turn right onto Raritan Center Pkwy 276 ft 4. Keep right at the fork, follow signs for Middlesex County 514 E/Woodbridge Ave/I-287/NJ-440 and merge onto Woodbridge Ave 0.4 mi 5. Take the I-95 ramp 0.9 mi 6. Follow signs for Trenton 0.4 mi 7. Keep left at the fork and merge onto I-95 S 27.8 mi 8. Continue onto New Jersey Turnpike S 25.9 mi 9. Take exit 4 for New Jersey 73 0.5 mi 10. Keep right at the fork, follow signs for NJ-73 N and merge onto NJ-73 N 0.7 mi 11. Slight right to merge onto I-295 S toward Del Memorial Bridge 10.9 mi 12. Take the exit on the left onto NJ-42 S toward Atlantic City 1.4 mi 13. Take exit 13 to merge onto NJ-55 S toward Glassboro/Vineland 11.4 mi 14. Take exit 48 toward Ferrell/Glassboro 0.2 mi 15. Turn left onto Ellis St/Ellis Mill Rd Continue to follow Ellis St 0.7 mi 16. Turn right onto Jacob Harris Ln 0.2 mi

Destination is 82.1 miles = 1 hours and 20 minutes

Directions to Site from Office: (Concluded)



This map is subject to Google's Terms of Service, and Google is the owner of rights therein.

Historical/Current Site Information:

On August 29. 2013, the New Jersey Department of Environmental Protection (NJDEP) notified the U.S. Environmental Protection Agency (EPA), Region II Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site (the Site). NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013, EPA OSCs met with NJDEP and Gloucester County officials at the Site. Thousands of containers were observed, mostly 275-gallon totes and 55-gallon drums, located along the road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in various locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers

were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, however most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, and non-hazardous material.

NJDEP collected samples from four random containers, all 55-gallon drums. Field screening tests were conducted on the selected drums using Photoioization Detectors, HazMat ID, pH, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers, which indicated the contents were non-hazardous.

County officials indicated that attempts to reach the property owner failed numerous times. The owner filed for bankruptcy in 2012 but the case was dismissed due to lack of information provided by the plaintiff.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

The Site is located at 798 Jacob Harris Rudd-in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5 acre property. The entrance to the facility is down a dirt road. The northern portion of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Road marks the eastern boundary of the Site, beyond which is a densely forested property. To the South are private lands which are also densely wooded with several marshy areas. The western boundary is indicated by Rt. 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Road, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is where the permanent steel structure is located. This area would receive containers, rinse the containers, and recondition them for future market. This area is approximately 2.4 acres with containers located throughout. The additional operational area appears to be mainly storage of full 275-gallon and 55-gallon totes, with several trailers holding containers. This area encompasses approximately 0.32 acres of land, also holding hundreds of totes and drums. Both areas show signs of impact from leaking containers or dumping of materials.

RST 2 Scope of Work:

As part of the Removal Assessment, Weston Solutions, Inc., Removal Support Team 2 (RST 2) is tasked by the EPA with conducting multi-media sampling including drum and tank waste, floor drain sediment, surface soil and sediment, and surface water. Liquid, sludge, and solid drum waste and soil and sediment samples will be analyzed for target compound list (TCL) volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), target analyte list (TAL) metals, including mercury and cyanide, and polycyclic aromatic hydrocarbons (PAHs). RST 2 will perform activities including an initial Site entry in Level B personnel protective equipment (PPE) to conduct air monitoring and radiation screening of the on-site structure and container storage areas surrounding the building,

drum/container inventory, sampling of drums and containers for Hazcat field screening [to be conducted by EPA Emergency and Rapid Response Services (ERRS) contractors], and site documentation.

Four (3) S.M.A.R.T. Health and Safety Goals for the Project (Simple, Measurable, Actionable, Reasonable, & Timely):

- 1. Use of appropriate/complete PPE during entry activities based on air monitoring instrumentation readings.
- 2. Safely sample drums/containers and soil located throughout the Site.

| 3. <u>Safe naviga</u> | ation (n | no accidents) while in the vehicle. | |
|-----------------------|----------|--|-----|
| Incident Type: | Г | Emergency Response |) |
| | 5 | Removal Assessment: September 9 through 20, 2013 | and |
| | Г | Removal Action | |
| | Г | Residential Sampling/Investigation | |
| | Г | PRP Oversight | |
| | Γ | Other | |
| Location Class: | | | |
| | 7 | Industrial | • |
| | | Commercial | |
| | С | Urban/Residential | |
| | V | Rural | |

U.S. EPA OSC: Keith Glenn

Original HASP: Yes

Lead RST 2: Peter Lisichenko

Date of Initial Site Activities: 9/9/2013

Site Health & Safety Coordinator: Peter Lisichenko

Site Health & Safety Alternate: Joel Siegel

Response Activities/Dates of Response (fill in as applicable)

Decontamination

| Emergency Response: | , . |
|---------------------|----------------------|
| Г. | Perimeter Recon. |
| . г | Site Entry |
| · · · · · · | Visual Documentation |
| · | Multi-Media Sampling |

Assessment:

- Perimeter Recon: <u>September 9 through 20, 2013</u>
- Site Entry: September 9 through 20, 2013
- Visual Documentation: <u>September 9 through 20, 2013</u>
- Multi-Media Sampling: September 9 through 20, 2013
- Decontamination: September 9 through 20, 2013

Physical Safety Hazards to Personnel

| ĕ | Inclement Weather – Attach FLD02 | V | Heat – Attach FLD05 | Ē | Cold – Attach FLD06 |
|----|---|----------|---|-------|--|
| Γ | Confined Space - Attach FLD08 | Ľ. | Industrial Trucks – Attach FLD09 | Г | Manual Lifting - Attach FLD10 |
| Γ | Terrain – Attach FLD11 | F | Structural Integrity - Attach FLD13 | Γ | Site Security – Attach FLD14 |
| Γ | Pressurized Containers, Systems – Attach FLD16 | Γ | Use of Boats - Attach FLD18 | Γ | Waterways - Attach FLD19 |
| Γ | Explosives – Attach FLD21 | ₹ | Heavy Equipment - Attach FLD22 | Г | Aerial Lifts and Manlifts – Attach FLD24 |
| С | Elevated Surfaces and Fall Protection – Attach | C | Ladders – Attach FLD26 | Г | Excavations/Trenching - Attach FLD28 |
| | FLD25 Fire Prevention - Attach FLD31 | Tr figur | Demolition – Attach FLD33 | Γ | Underground/Overhead Utilities – Attach FLD34 |
| Γ. | Hand and Power Tools – Attach FLD38 | Þ. | Illumination – Attach FLD39 | ٢ | Storage Tanks - Attach FLD40 |
| Γ | Lead Exposure – Attach FLD46 | Ş | Sample Storage – Attach FLD49 | · | Cadmium Exposure – Attach FLD50 |
| | Asbestos Exposure – Attach FLD52 | Γ | Hexavalent Chromium Exposure – Attach FLD 53 | ٢ | Benzene Exposure – Attach FLD 54 |
| Γ. | Drilling Safety – Attach FLD56 | P | Drum Handling - Attach FLD58 | Γ.: | Gasoline Contaminant Exposure – Attach FLD61 |
| Г. | Noise - Attach CECHSP, Section 7 | Γ. | Walking/Working Surfaces | Γ | Oxygen Deficiency |
| ₹. | Unknowns in Tanks or Drums | r | Nonionizing Radiation | Γ | Ionizing Radiation |

Biological Hazards to Personnel

☐ Infectious/Medical/Hospital Waste — Attach FLD 44 and 45
☐ Insects — Attach FLD 43B
☐ Raw Sewage
☐ Bloodborne Pathogens — Attach FLD 44 and

Training Requirements

40-Hour HAZWOPER Training with three days supervised experience
 8-Hour Management or Supervisor Training in addition to basic training course
 8-Hour Annual Refresher Health and Safety Training
 DOT (CMV Training - ERV in Use)
 8-Hour Management or Supervisor Training in addition to basic training
 Site Specific Health and Safety Training
 Bio-Medical Collection and Response Use)

Medical Surveillance Requirements

Baseline initial physical medical Annual examination with examination with physician physician certification certification Site Specific medical monitoring Asbestos Worker medical protocol (Radiation, protocol Heavy Metals)

Vehicle Use Assessment and Selection

Driving is one of the most hazardous and frequent activities for Weston Employees. As such, Weston Employees are required to adhere to established safe operating practices in order to maintain their eligibility to drive Weston owned, leased, or rented vehicles. Every person riding in a Weston vehicle, including passengers must maintain a commitment for a safe journey. This means being attentive while in the vehicle and helping the driver to notice hazards ahead of and around the vehicle and ensure that their presence does not distract the driver from safely operating the vehicle.

A high percentage of vehicle accidents occur when operating in reverse. Anytime a vehicle is operated in reverse, e.g., backing out of a parking area, if there are passengers, at least one of them are to assist the driver by acting as a guide person during the reverse movement or during other vehicle operation where it would be prudent to have a guide person(s) participate in the vehicle movement. When practical, the preferred parking method would be to back into the parking area. At a minimum, each Weston Driver must:

- Possess a current, valid drivers' license
- Obey posted speed limits and other traffic laws
 - Wear seat belts at all times while the vehicle is in operation
- Conduct a 360 degree inspection around the vehicle before attempting to drive the vehicle

Report accidents / incidents immediately and complete a Notice of Incident (NOI) Keep vehicles on approved roadways (4WD doesn't guarantee mobility on unapproved surfaces)

All Region II RST personnel are experienced and qualified to drive RST fleet vehicles (Trailblazers, Suburbans, Cargo Van, and 10' x 12' Box Truck). However, in the event that vehicle rental is required, each person must take the time to familiarize themselves with that particular vehicle. This familiarization includes adjustment of the dashboard knobs/controls, mirrors, steering wheel, seats, and a 360 degree external inspection of the vehicle.

| . The following vehicles are a | nticipated to be use | a on this project | • |
|---|---------------------------------|----------------------------------|---------------------------------------|
| Car | | Pickup Truck | |
| Intermediate/Standard SUV Trailblazer, Chevy Tahoe, Ford Escape) | | Full Size SU Ford Expedition, | V (e.g. Chevy Suburban, GMC Yukon) |
| Minivan/Cargo Van (Uplander) | e.g. Chevy | Box Truck (Siz | ze: <u>16 foot</u>) |
| Emergency Response Vehi | cle (ERV) | Other | |
| | | | |
| . Are there any on-site consider | erations that should | I be noted? | |
| Working/Driving Surfaces | _ Debris | Clearance | Obstructions |
| Tire Puncture Hazards | r Vegetation | ☑ Terrain | Parking |
| Congestion | Site Entry/Exit Hazards | Local Traffic Volume | Security |
| Heavy Equipment | Time/Length of Work Day | Cother: | |
| Do any of the considerations abo | ove require further | explanation: No | |
| . Was the WESTON Environn | nental Risk Manag | ement Tool com | pleted in EHS? <u>Yes</u> |
| Was an Environmental Complia | | | |
| Are there any seasonal co Conditions): <u>No</u> | nsiderations that s | hould be noted | (e.g., Anticipated Sno |
| 5. Is a Traffic Control Plan requ | ired? | r Yes ₽ | No |

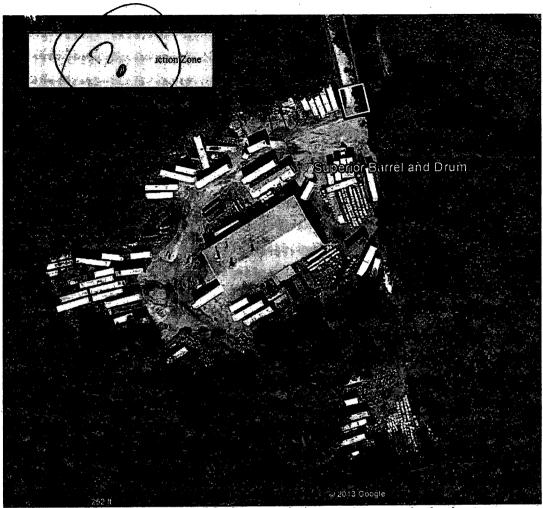
Chemical Hazards to Personnel

The contents of many on-site drums/containers are unknown to RST 2. Further information regarding on-site contaminants will be determined throughout on-site Hazcat field screening activities.

| Physical Parameters | To be Determined |
|--|--|
| Exposure Limits IDLH Level | ppm mg/m³ PEL ppm mg/m³ REL ppm mg/m³ IDLH |
| Physical Form (Solid/Liquid/Gas) Color | Solid Liquid GasColor |
| Odor | Odorless |
| Flash Point Flammable Limits | Degrees F |
| Vapor Pressure Vapor Density | mm Air = I |
| Specific Gravity | Water = 1 |
| Solubility | |
| Incompatible Material | |
| Routes of Exposure | Inh Abs |
| Symptoms of Acute Exposure | |
| First Aid Treatment | |
| Ionization Potential | eV |
| Instruments for Detection | PID w/ Probe FID CGI RAD Det Tube pH Other |

Control Measures

Site Map with work zones:



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<u>Exclusion Zone</u> - the area where contamination is either known or expected to occur and the greatest potential for exposure exists. The outer boundary of the Exclusion Zone, called the Hotline, separates the area of contamination from the rest of the Site.

<u>Contamination Reduction Zone (CRZ)</u> - the area in which decontamination procedures take place. The purpose of the CRZ is to reduce the possibility that the Support Zone will become contaminated or affected by the site hazards.

<u>Support Zone</u> - the uncontaminated area where workers are unlikely to be exposed to hazardous substances or dangerous conditions. The Support Zone is the appropriate location for the command post, medical station, equipment and supply center, field laboratory, and any other administrative or support functions that are necessary to keep site operations running efficiently.

Communications:

| V | Buddy System | E | Radio |
|----------|-----------------------------|-----|------------------------------|
| C | Air Horn for Emergencies | . ₩ | Hand Signals/ Visual Contact |

Personnel Decontamination Procedures:

Wet Decontamination (procedures as follows)

Dry Decontamination (procedures as follows)

All work will be done in Level B, C, or D PPE. Sampling equipment and grossly contaminated PPE will be bagged separately. At this time, all PPE and sampling equipment will be bagged or drummed, labeled, and placed inside of the building for future disposal.

Equipment Decontamination Procedures:

None
 Wet Decontamination (procedures as follows)
 □ Dry Decontamination (procedures as follows)

It is anticipated that all samples will be collected utilizing dedicated disposable equipment which will be void of gross contamination and disposed of in accordance with federal, state, and local regulations. However, is non-dedicated sampling equipment is used it will be decontaminated on site as follows:

- 1. Alconox detergent and potable water scrub.
- 2. Potable water rinse.
- 3. Deionized water rinse.
- 4. 10% Nitric Acid rinse.
- 5. Deionized water rinse.
- 6. A hexane rinse (pesticide-grade or better).
- 7. Air dry (sufficient time will be allowed for the equipment to completely dry).
- 8. Deionized water rinse and air dry.

Adequacy of decontamination determined by: Site Health & Safety Officer

Personal Protective Equipment

| per control of the co | | | | |
|--|---------------------------------------|--|--|-------------------------------|
| TASK TO BE PERFORMED | ANTICIPATED LEVEL OF PROTECTION | TYPE OF CHEMICAL PROTECTIVE COVERALL | INNER GLOVE / OUTER GLOVE / BOOT COVER | APR CARTRIDGE TYPE or SCBA |
| Initial Site Entry | В | Saranex/Tyvek | Blue Nitrile/Green Nitrile/Latex Booties | SCBA/P-100 Cartridges |
| Opening Unknown Drums/ Sample Collection from Unknown Drums/Containers | В | Saranex | Blue Nitrile/Green Nitrile/Latex Booties | SCBA |
| Sample Collection from Unknown Drums/Containers | B/C | Saranex/Tyvek | Blue Nitrile/Green Nitrile/Latex Booties | SCBA/P-100 Cartridges |
| Soil Sampling | C/D | Tyvek | Blue Nitrile/Green Nitrile/Latex Booties | SCBA/P-100 Cartridges |
| Site Documentation | D | None | Nitrile Gloves/Latex boot covers | None |

Hazard Task Analysis

| RISK LEVEL (High, Medium, Low) | TASK/HAZARD | RECOGNITION/ SYMPTOMS | MITIGATION | LEVEL OF PROTECTION |
|--------------------------------------|---|--|---|------------------------|
| Medium | Task: Level B Entry with air monitoring, Opening and Sample Collection of Drums, Tanks, Pits, Wastes, Building Interior with Unknowns; Climbing portable ladder to investigate/ sample ASTs with Unknowns. Hazard: Chemical exposure; Intrusive activities have the potential for exposure to site contaminants | See FLD6, FLD10, FLD13, FLD26, FLD39, FLD40, FLD43A, FLD43B, FLD44, FLD45, FLD53, FLD58 | Appropriate levels of PPE and proper decontamination procedures will be utilized to mitigate the risk of exposure to site contaminants. Monitoring and/or sample results may indicate a need to upgrade or downgrade. Utilize portable ladder for the designed purpose and in accordance with FLD26. | Level B |
| Hìgh | Task: Initial Site Entry/Container Inventory Hazard: Slips, trips, or falls on walking and working surfaces | See FLD6, FLD10, FLD13, FLD39, FLD40, FLD43A, FLD43B, FLD44, FLD45, FLD53 | Maintain clean work areas by following good housekeeping procedures. Properly illuminate work areas Wear slip resistant footwear when walking/working on slippery surfaces; aware and avoid wet slippery areas. | Level B/C |

Frequency and Types of Air Monitoring: None.

Continuous - F

| Routine - |
|-----------|
|-----------|

Periodic -

| DIRECT READING INSTRUMENTS | MultiRAE CGI / O ₂ / H ₂ S / CL ₂ / CO / PID (10.6 EV Lamp) | Ludlum 19 Micro-R Meter / Ludlum Model 3 Survey Meter | MicroFID or TVA-1000 | MiniRae PID (11.7 EV Lamp) | AreaRaes |
|----------------------------------|--|--|--|--|--|
| EQUIPMENT ID NUMBER | TBD | TBD | *************************************** | | TBD |
| CALIBRATION DATE | | | | | |
| | TBD | TBD | | | TBD |
| RST 2 PERSONNEL | | | | | |
| h | TBD | TBD | | | TBD |
| ACTION LEVEL | ≥ 10 - 20% LEL (Confined Space / non- Confined Space) ≤ 19.5%, O ₂ Deficient ≥ 23% O ₂ - Enriched H ₂ S - PEL: 20 ppm IDLH: 100 ppm Cl ₂ - PEL: 1 ppm IDLH: 10 ppm | <3X Background Exercise Caution; ≥ 1 mR/HR – Exit Area, Establish Perimeter, Contact RST 2 HSO | Unknowns: 1 - 5 Units - "Level C" 5-500 Units- "Level B" | Unknowns: 1 - 5 Units - "Level C" 5-500 Units- "Level B" | Mercury Vapors (Except Organo Alkyls): PEL - 0.1 mg/m3 IDLH - 10 mg/m3 |
| | | | | | |

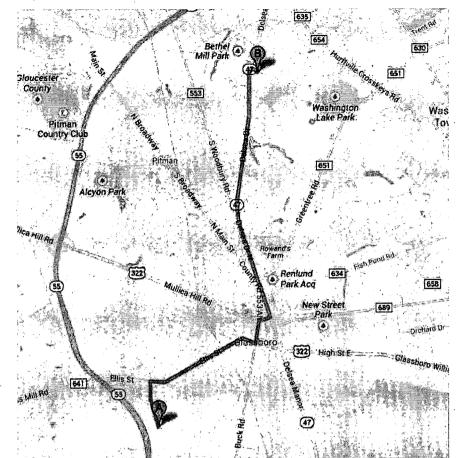
| Dräger Tubes | Expiration Date | Strokes | Color Change |
|-------------------------------------|--------------------------------------|----------|--------------------------------|
| Nitrogen Dioxide - 2 to 100 PPM | See individual package before use | 10 or 5 | yellowish-green to bluish-grey |
| Phosgene - 0.25 to 5 PPM | See individual package | 40 or 20 | white to red |
| Hydrochloric Acid - 50 to 5,000 PPM | See individual package | 1 or 10 | blue to white |
| Cyanide - 2 to 15 mg/m ³ | See individual package | 10 | yellow to red |
| Acetic Acid - 5 to 80 PPM | See individual package | 3 | blue/violet to yellow |
| Chlorine - 0.2 to 3 PPM | See individual package | 10 | white to yellowish-orange |
| Ammonia - 5 to 70 PPM | See individual package | 10 | yellow to blue |

Emergency Telephone Numbers

| Emergency Contact | Location / Address | Telephone Number | Notified |
|--------------------------|---|-------------------------------|----------|
| Hospital | Cooper University Hospital 2 Plaza Drive Sewell, NJ 08080 | (856) 270-4100 | No |
| Ambulance | Monroe Township Ambulance and Rescue Association 700 Corkery Lane Williamstown, NJ 08094 | (856) 629-3301 Or call 911 | No |
| Police | Glassboro Police Department 1 South Main Street Glassboro, NJ 08028 | (856) 881-1500 Or call 911 | No |
| Fire Department | Glassboro Fire Department 27 High Street East Glassboro, NJ 08028 | (856) 881-5008 Or call 911 | No |

| Chemical Trauma Cap | ability? | Ø | Yes | L No | |
|------------------------------------|---------------------------------------|----------|--------|--------------|------------------|
| If no, closest backup: _ | · · · · · · · · · · · · · · · · · · · | | | | Phone |
| Directions to Cooper Univer | sity Hospital | <u>:</u> | | • | |
| 1. Head norther | ast on Jacob | Harris l | Ln tov | vard Ellis S | t |
| | | | | | 0.5 mi |
| 2. Take the 1st i | ight onto Ell | is St | | • | |
| • | | • | | | 1.2 mi |
| 3. Turn right on | to High St W | 7 | | | |
| | | • | | | 0.2 mi |
| 4. Take the 3rd | left onto Cou | nty Rd | 553 A | lt/N Main | St |
| | | | | • | 0.3 mi |
| 5. Take the 3rd | right onto W | est St | | | |
| | | | | | 0.1 mi |
| 6. Turn left onto |) NJ-47 N/D | elsea Dr | N | | |
| | | | | | 2.9 mi |
| 7. Turn right on | to Holly Dell | l Dr | | | |
| | | | | | 489 ft |
| 8. Take the 1st r | - | • | Ct | | |
| Destination will | de on the lei | τ | | | 70 A |
| | | | | | 79 ft |

Total Estimated Distance: 5.3 miles. Total Estimated Time: 12 minutes



This map is subject to Google's Terms of Service, and Google is the owner of rights therein.

Route verified by: _____ Date: __/__/

Additional Emergency Phone Contacts

| WESTON Medical Emergency Service Dr. Peter Greaney, Medical Director WorkCare 300 South Harbor Blvd, Suite 600 Anaheim, California 92805 | 800-455-6155 Regular Business Hours (9AM to 7:30PM) Dial 0 or Ext. 175 for Michelle Bui to request the on-call clinician. 800-455-6155 After Hours (Weekdays 7:31PM to 8:59AM, Weekends, Holidays) Dial 3 to reach the after-hours answering service. Request that the service connect you with the on-call clinician or the on-call clinician will return your call within 30 minutes. |
|--|---|
| Chemtrec | 800-424-9300 |
| ATSDR | 404-639-0615 |
| ATF (explosives information) | 800-424-9555 |
| National Response Center | 800-424-8802 |
| National Poison Control Center | 800-764-7661 |
| Chemtel | 800-255-3924 |
| DOT | 800-424-8802 |
| CDC | 800-232-0124 |
| Market Art 100 C C C C C C C C C C C C C C C C C C | |

Pre-Response Approval

HASP prepared by: Peter Lisichenko

Date: 9/6/2013

Pre-Response/Entry Approval by:

280

Date: 9 16 113

| Tasks Conducted | Level of Protection/Specific PPE Used | | |
|--|---------------------------------------|--|--|
| Initial Site Entry | Level B | | |
| Opening Unknown Drums/ Sample Collection from Unknown Drums/Containers | Level B | | |
| Sample Collection from Unknown Drums/Containers | Level B/C | | |
| Soil Sampling | Level C/D | | |
| Site Documentation | Level D | | |

Hazardous Waste Site and Environmental Sampling Activities

Off Site: Yes No
On Site: Yes No

Describe types of samples and methods used to obtain samples:

RST 2 is tasked with the collection of up to 250 multi-media samples including soil, sludge, and liquid waste from abandoned drums, and stained soil areas observed beneath drums and tanks. Hazcat field screening of drum/liquid waste samples will be conducted by the ERRS contractor, and drum/liquid waste samples will be selected for laboratory analysis based on the Hazcat results.

This sampling design is based on a project scoping session held on September 5, 2013 and may be modified on-site in light of field-screening results and other acquired information.

Sludge, Soil and Liquid Waste Sampling

The drum and tank liquids/liquid waste will be sampled using dedicated, disposable coliwasas. The sludge/solid waste samples will be collected from the drums, tanks, samples from building interior as grab samples using dedicated, disposable plastic scoops and placed into dedicated glass sample jars. Soil samples will be collected from the stained areas using dedicated, stainless-steel and/or disposable plastic scoops and placed into dedicated glass sample jars. Samples will be submitted for low, medium, and high concentration analyses. If trace concentration organic analyses are required for some samples, then non-dedicated stainless-steel sampling equipment will be used. Equipment rinsate blanks will be collected as necessary. The samples will be analyzed for parameters including, TCL VOCs, TCL SVOCs, TCL PCBs, TAL metals, including mercury and cyanide, and PAHs. Sludge/solid waste and liquid waste samples will also be analyzed for RCRA characteristics. Drum sampling activities will be conducted in accordance with guidelines outlined in EPA/ERT Drum Sampling SOP #2009. Tank sampling activities will be conducted in accordance with guidelines outlined in EPA/ERT Tank Sampling SOP #2010. These samples will then be analyzed on Site using a Hazcat kit. Based on results of the Hazcat field screening, the EPA OSC will determine the samples to be submitted for laboratory analysis.

Was laboratory notified of potential hazard level of samples?

▼ Yes No

Note: The nature of the work assignment may require the use of the following procedures/programs which will be included as attachments to this HASP as applicable: Emergency Response Plan, Confined Space entry Procedures, Spill Containment Program.

Disclaimer: This site-specific HASP was prepared for work to be conducted under the RST 2 Contract EP-W-06-072. Use of this site-specific HASP by WESTON and its subcontractors is intended to fulfill the OSHA requirements found in 29 CFR 1910.120. Items not specifically covered in this HASP are included by reference to 29 CFR 1910 and 1926.

The signatures below indicate that the individuals have read and understood this Health and Safety Plan.

| PRINTED NAME | SIGNATURE | AFFILIATION | DATE |
|--------------|-----------|-------------|------|
| | | | |
| | | | |
| | | | |
| | | | |

Post-Response Approval

| Final Submission of HASP by: | Date: |
|------------------------------|-------|
| Post Response Approval by: | Date: |
| RST 2 HSO Review by: | Date: |

Air Monitoring Summary Log

| Date:/ _/ | ~ | | |
|------------------|-------|------|--|
| | 21.22 | | |
| Data Collected b | y: | | |

| Station/Location | CGI / O ₂ Meter / CL2 / H2S | Radiation Meter | MultiRae PID (10.6 EV Lamp) | MiniRae PID (11.7 EV Lamp) | Other (HCN) |
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